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FILED

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PATRICK E. DUFFY, CLERK
By _____
DEPUTY CLERK, MISSOULA

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

UNITED STATES OF AMERICA,	CR 12- 36 -M- DWM
Plaintiff,	<u>INDICTMENT</u>
vs.	MAIL FRAUD (Counts I-VIII)
CHRISTIN DIANNE DIDIER,	18 U.S.C. § 1341
and SURAYYA MAHASIN	(Penalty: 20 years
NASIR,	imprisonment, \$250,000 fine,
Defendants.	and three years supervised
	release)
	CONSPIRACY (Count IX)
	18 U.S.C. § 371
	(Penalty: Five years
	imprisonment, \$250,000 fine,
	and three years supervised
	release)

THE GRAND JURY CHARGES THAT:

COUNTS I-VIII

THE SCHEME TO DEFRAUD

Beginning in approximately January 2008, and continuing until on or about June 19, 2008, in Flathead, Lake, and Fergus Counties, in the State and District of Montana, and other places, including California, the defendants, CHRISTIN DIANNE DIDIER and SURAYYA MAHASIN NASIR, executed a material scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses and representations, by defrauding DIDIER's insurance company, Pacific Indemnity Company, Chubb Group of Insurance Companies ("Chubb"), and ALE Solutions, Inc., a company hired by Chubb to assist DIDIER in finding temporary housing while her primary residence was repaired, by representing: (a) that DIDIER needed \$15,250 per month to rent a residence near Rollins, Montana; (b) that the residence had 6,900 square feet, five bedrooms, two bathrooms, and an in-ground pool; and (c) that DIDIER did not have an ownership interest in the residence, when in truth and in fact DIDIER

owned the residence and the residence is approximately 860 square feet, has two bedrooms, no indoor plumbing, and no pool.

MAIL FRAUD

On or about the dates listed in the table below, in Fergus County, in the State and District of Montana, and elsewhere, including Illinois, the defendant, CHRISTIN DIANNE DIDIER, for the purpose of executing the aforementioned material scheme and artifice to defraud, and for obtaining money and property by means of material false and fraudulent pretenses and representations, did knowingly cause to be delivered by mail any matter and thing, to wit, checks from ALE Solutions, Inc., in the amounts listed in the table below, for monthly rental payments for the Rollins residence referenced above, in violation of 18 U.S.C. § 1341.

Count	Date	Check Number	Amount	Mailed From	Mailed To
I	1/31/2008	64105	\$28,750.00	Illinois	Montana
II	2/19/2008	64472	\$17,791.50	Illinois	Montana
III	2/21/2008	64817	\$15,250.00	Illinois	Montana
IV	3/21/2008	66129	\$15,250.00	Illinois	Montana
V	4/22/2008	67584	\$15,250.00	Illinois	Montana

VI	5/21/2008	69027	\$15,250.00	Illinois	Montana
VII	6/19/2008	70300	\$15,250.00	Illinois	Montana

COUNT VIII

On or about January 31, 2008, in Fergus County, in the State and District of Montana, and elsewhere, including Illinois and California, the defendant, SURAYYA MAHASIN NASIR, for the purpose of executing the aforementioned material scheme and artifice to defraud, and for obtaining money and property by means of material false and fraudulent pretenses and representations, did knowingly cause to be delivered by mail any matter and thing, to wit, check number 64121 from ALE Solutions, Inc. to Surraya Nasir, in the amount of \$10,875.00, in violation of 18 U.S.C. § 1341.

COUNT IX

Beginning in approximately January 2008, and continuing until approximately June 2008, in Flathead, Lake, and Fergus Counties, in the State and District of Montana, and elsewhere, including California, the defendants, CHRISTIN DIANNE DIDIER and SURAYYA MAHASIN NASIR, did knowingly combine, conspire, confederate and

agree to commit an offense against the laws of the United States, that being mail fraud in violation of 18 U.S.C. § 1341.

OVERT ACTS

In furtherance of the conspiracy and to effect its objects, the conspirators committed numerous overt acts in the District of Montana and elsewhere, including, but not limited to, the following:

1. On or about January 24, 2008, DIDIER told K.W. (full name withheld to protect privacy), a representative from ALE Solutions, Inc., that the landlord for the Rollins residence referenced above in Counts I-VII lived in California and that she was working with the landlord's broker in order to lease the property.

2. On or about January 24, 2008, NASIR completed a Property Worksheet and faxed it to K.W. so that K.W. could determine a fair market rental price for the Rollins residence.

3. On or about January 29, 2008, NASIR faxed K.W. a statement representing that NASIR was the broker of record for the Didier Trust, the entity that owned the Rollins residence, and that she had a lease agreement for the residence signed by the trust.

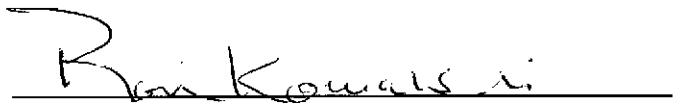
4. On or about January 29, 2008, both DIDIER and NASIR denied to K.W. that DIDIER had any ownership interest in the Rollins residence and said that the property was owned by DIDIER's relatives.

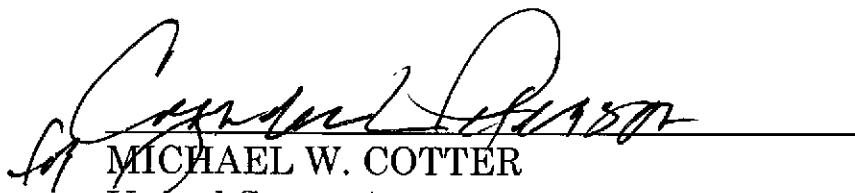
5. On or about January 31, 2008, DIDIER faxed a move-in report to K.W. describing the condition of the residence and noting that it had five bedrooms and two bathrooms.

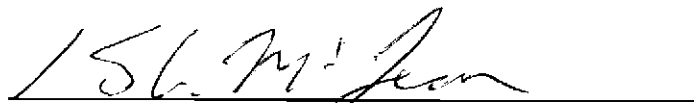
6. On or about January 31, 2008, K.W. faxed NASIR a letter of commitment and the lease agreement that had been prepared by NASIR and signed by DIDIER.

All in violation of 18 U.S.C. § 371.

A TRUE BILL.


FOREPERSON


MICHAEL W. COTTER
United States Attorney
Attorney for Plaintiff


KRIS A. McLEAN
Criminal Chief Assistant U.S. Attorney
Attorney for Plaintiff

WARRANT ☒

BAIL ☐

CRM/SUM ☒ Return 10/2/12 @ 1:30 P.M.
JCL